

United States Bankruptcy Court
Western District of Wisconsin

In re **PinSeekers DeForest Operations LLC**

Debtor(s)

Case No. **3-25-10326**Chapter **11**

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$	<u>134,893.00</u>
Prior to the filing of this statement I have received	\$	<u>134,893.00</u>
Balance Due	\$	<u>0.00</u>

2. The source of the compensation paid to me was:

☐ Debtor ☒ Other (specify): **See Attached**

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify):

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- d. [Other provisions as needed]

See Application for Authority to Retain and Employ Swanson Sweet LLP as General Bankruptcy Counsel (ECF No. 16), Paragraph 11.

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

Services requiring special expertise not available in-house.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

Date

Rebecca R. DeMarb

Signature of Attorney

SWANSON SWEET LLP

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Name of law firm

In re PinSeekers DeForest Operations LLC
Case No. 25-10326-beh
Attachment to Form B2030
Disclosure of Compensation of Attorney for Debtor(s)

Question 1. "For legal services, I have agreed to accept \$134,893.00"

On February 18, 2025 (the "Petition Date"), PinSeekers DeForest Operations LLC (the "Debtor") filed an Application for Authority to Retain and Employ Swanson Sweet LLP as General Bankruptcy Counsel (the "Application"). ECF No. 16. Through the Application, the Debtor seeks authority to retain and employ Swanson Sweet LLP pursuant to section 327 of the Bankruptcy Code, with compensation paid in accordance with section 330 of the Bankruptcy Code. Swanson Sweet LLP intends to seek compensation based on the work performed, billed at the hourly rates of the attorneys and paraprofessionals of the firm, plus reimbursement of the actual and necessary expenses Swanson Sweet LLP incurs.

As disclosed in the Application, Swanson Sweet estimates that total fees and costs for its retention in this case as general bankruptcy counsel may range up to or beyond \$350,000.00. However, for purposes of this question, Swanson Sweet LLP has listed \$134,893.00 to indicate that there is no balance due as of the Petition Date (*see* Part 3 of Question 1).

Question 2. "The source of compensation paid to me was: Other"

Prior to the Petition Date, Swanson Sweet LLP received \$134,893.00 in connection with this matter. Swanson Sweet LLP invoiced the members of Golf DeForest RE LLC (one of the Debtor's members) \$70,303.00 for services rendered and costs incurred from June 20, 2024, to February 8, 2025. In addition, Swanson Sweet LLP invoiced the Debtor \$64,590.00 for services rendered and costs incurred from February 9, 2025, to February 18, 2025. Swanson Sweet LLP currently holds \$95,587.00 in its trust account.

Swanson Sweet LLP received funds from the following entities for its invoices and advanced payment retainers:

Date	Payor	Amount
8/12/2024	PinSeekers DeForest LLC	\$7,935.00
8/12/2024	PinSeekers DeForest LLC	\$15,000.00
9/20/2024	PinSeekers DeForest LLC	\$1,530.00
12/2/2024	PinSeekers DeForest LLC	\$6,015.00
1/28/2025	Golf DeForest RE LLC	\$50,000.00
2/13/2025	PinSeekers DeForest Operations LLC	\$100,000.00
2/18/2025	PinSeekers DeForest Operations LLC	\$50,000.00
Total Received		\$230,480.00
Paid from June 20, 2024, to February 8, 2025		(\$70,303.00)
Paid from February 9, 2025, to February 18, 2025		(\$64,590.00)
Amount Held in Trust		\$95,587.00